

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SEAMOUNT INTERNATIONAL  
ASSOCIATION, LTD., :  
Petitioner, :  
v. : 06 Civ. 5648 (LTS)  
KUEHNE & NAGEL LTDA., :  
Respondent. :  
- - - - - x

MOTION TO EXTEND TIME TO FILE OPPOSITION TO  
PETITION TO COMPEL ARBITRATION AND ADJOURN THE  
CONFERENCE SCHEDULED FOR AUGUST 24, 2006

Respondent Kuehne & Nagel Ltda. hereby moves the Court for an Order extending time to oppose the petition to compel arbitration and adjourn the conference scheduled for August 24, 2006. The undersigned counsel sought the consent of counsel for the petitioner, but was advised that such consent would not be given. Respondent has not sought or obtained any previous extensions of time. Such extension is timely and is necessary to allow additional time to prepare such opposition because counsel for respondent was out of town on vacation and did not return until Monday, August 14, 2006, at which time he received the petition and Order of this Court.

Respondent respectfully requests that the Court  
(i) grant an additional 14 days by which to file its

opposition to the petition to compel arbitration and (ii) adjourn the conference scheduled for August 24, 2006 for a period of 14 days, or as to the Court seems just.

Dated: New York, New York  
August 16, 2006

LAW OFFICES OF ERNEST H. GELMAN

By 

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